

***s/ John S. Bryant***  
U.S. Magistrate Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

AMERICAN NATIONAL PROPERTY AND	)	
CASUALTY COMPANY,	)	
	)	Civil Action No. 3:08-cv-00604
Plaintiff,	)	
	)	Judge Trauger
v.	)	Magistrate Judge Bryant
	)	
CAMPBELL INSURANCE, INC., et al.,	)	JURY DEMAND
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE REPLIES TO**  
**RESPONSES TO MOTIONS TO COMPEL**

American National Property respectfully moves, pursuant to LR 7.01(b), to file replies to the responses filed by (1) the Campbell Defendants (Docket No. 383) and (2) Liberty Mutual Insurance Company and Montgomery Mutual Insurance Company (collectively "Liberty") (Docket No. 385) to American National's motion to compel (Docket No. 375).

As grounds for this motion, American National states that the Campbell Defendants' response, although devoted largely to a spoliation issue not before the Court, ignores arguments asserted by American National and misstates other important information, such as whether certain information was requested and whether digital information is available. As to Liberty, since it had not responded to the subject discovery when this motion was filed, this is the first time American National has had an opportunity to address the particular deficiencies of Liberty's subject discovery responses. The proposed replies are appended hereto as Appendix A (Campbell Defendants) and Appendix B (Liberty).

WHEREFORE, American National respectfully moves that the Court grant leave to file the attached proposed replies to the Campbell Defendants' response (Docket No. 383) and